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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

JEREMY STANFIELD, ROMONIA
PERSAUD, SHABNAM SHEILA
DEHDASHTIAN, SAIRA LOSOYA, AND
EVA WILLIAMS, individually, on behalf of
all others similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

FIRST NLC FINANCIAL SERVICES, LLC,
and DOES 1 through 50, inclusive,

Defendants.

Case No. C 06-3892 SBA JL

**STIPULATION AND ~~[PROPOSED]~~
ORDER CONTINUING PHASE ONE
DISCOVERY CUT-OFF DATE
CIV. L.R. 6-2(a)**

Judge: Hon. Sandra Armstrong
Date Action Filed: June 22, 2006

**STIPULATION AND ~~[PROPOSED]~~ ORDER CONTINUING PHASE ONE
DISCOVERY CUT-OFF DATE**

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1 PURSUANT TO LOCAL RULE 6-2(a), Plaintiffs Jeremy Stanfield, *et al.* and
2 Defendant First NLC Financial Services, LLC (collectively, “the parties”) stipulate as follows:

3 WHEREAS, the March 15, 2007 Order (Dkt. #214) sets the phase one class
4 certification discovery cut-off as June 12, 2007;

5 WHEREAS, the parties have been conducting written and deposition discovery
6 throughout the discovery period;

7 WHEREAS, the parties have agreed to engage in mediation of this case in
8 Williamsburg, Virginia, beginning on April 11 and April 12;

9 WHEREAS, in light of the parties’ focus on mediation, the parties stipulate that
10 phase one discovery should be continued from June 12, 2007 to July 12, 2007;

11 WHEREAS, the parties’ stipulation should not affect the other dates in the Court’s
12 Order for Pretrial Preparation, dated December 21, 2006 (Dkt. #146);

13 WHEREAS, nothing by this stipulation or any other written or oral agreement by
14 First NLC shall be construed as an admission or a waiver that class certification or a collective
15 action for any of these job positions identified in Plaintiffs’ complaints or in this case is
16 appropriate;

17 IT IS HEREBY STIPULATED by and between the parties to this action through
18 their designated counsel as follows:

19 The parties respectfully request that this Court modify Paragraph A of the December 21,
20 2006 Order for Pretrial Preparation as follows: “All phase one discovery, except for expert
21 discovery, shall be completed and all depositions taken on or before **7/12/07**. The parties are
22 responsible for scheduling discovery so that motions to resolve discovery disputes can be heard
23 before the above discovery cut-off.”

1 Dated: April 5, 2007

2 NICHOLS KASTER & ANDERSON, LLP

3 /s/

4 By: _____

5 Bryan J. Schwartz

6 Attorneys for Plaintiffs and Representative Plaintiffs

7 Dated: April 5, 2007

8 ORRICK, HERRINGTON & SUTCLIFFE LLP
9 NELSON MULLINS RILEY & SCARBOROUGH
10 LLP

11 /s/

12 By: _____


13 Attorneys for Defendant

14 First NLC Financial Services, LLC

15 **ORDER**

16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17 Dated: 4/13/07

18 
19 Honorable Sandra Armstrong
20 United States Magistrate Judge